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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

INTERNATIONAL LONGSHORE  
AND WAREHOUSE UNION,

Debtor.

Case No. 23-30662 (HLB)

Chapter 11

**NOTICE OF AGREED PROPOSED  
CONFIRMATION SCHEDULE**

Scheduling Conference:

Date: October 19, 2023  
Time: 1:00 p.m. (Pacific Time)  
Place: Zoom / Telephonic  
Judge: Hon. Hannah L. Blumenstiel

**PLEASE TAKE NOTICE** that, on October 2, 2023, the above-captioned debtor and debtor in possession (the “Debtor”) filed its *Plan of Reorganization for Small Business Under Chapter 11* [Docket No. 18] (the “Plan”).

**PLEASE TAKE FURTHER NOTICE** that, at a hearing convened on October 4, 2023, the Court (1) set **October 19, 2023 at 1:00 p.m. (Pacific Time)** as a scheduling conference (the “Scheduling Conference”) to discuss a date and time for convening a confirmation hearing, deadlines for briefing in advance of the confirmation hearing, and deadlines for conducting any discovery that might be necessary prior to the confirmation hearing (collectively, the “Scheduling Issues”); and (2) ordered the Debtor, ICTSI (Oregon), Inc. (“ICTSI”), the subchapter V trustee Mark Sharf (the “Subchapter V Trustee”), and an attorney from the Office of the United States Trustee

(the “UST” and collectively, the “Scheduling Parties”) to meet and confer by telephone or video prior to the Scheduling Conference to discuss the Scheduling Issues.

**PLEASE TAKE FURTHER NOTICE** that, on October 16, 2023, the Scheduling Parties met and conferred via Zoom to discuss the Scheduling Issues. Subsequent to the meet and confer, the Debtor and ICTSI reached agreement on a schedule concerning the confirmation hearing and related discovery and briefing.<sup>1</sup> The agreed proposed confirmation schedule is set forth in the table below.

Event	Date
Deadline to File First Amended Plan	11/2/2023
Deadline to Serve Plan / Ballots (by email on ICTSI counsel)	11/3/2023
Deadline to Serve Discovery Requests	12/1/2023
Deadline to Serve Written Responses to Discovery Requests	14-days after service
Deadline to Begin Rolling Document Production	14-days after service
Deadline to Substantially Complete Document Production	21-days after service
Fact Discovery Deadline	12/22/2023
Voting Deadline	1/5/2023
Ballot Summary	1/9/2024
Plan Objection Deadline	1/15/2024
Deadline to File Witness and Exhibit Lists	1/25/2024
Confirmation Brief / Reply	1/25/2024
Confirmation Hearing	2/1/2024

Dated: October 18, 2023

PACHULSKI STANG ZIEHL & JONES LLP

*/s/ Jason Rosell*

Debra I. Grassgreen  
Jason H. Rosell

*Counsel to the Debtor*

<sup>1</sup> The Debtor understands that the UST and Subchapter V Trustee do not take a position with respect to the confirmation schedule.